

# SNYDER BROTHERS, INC.

P.O. Box 1022  
Kittanning, PA 16201  
Phone (724) 548-8101

NO AFS#  
Natalia  
Vasquez  
USPS 0000a

OCT 11 2018

October 10, 2018

Mr. Mark Gorog  
Regional Air Quality Program Manager  
Pennsylvania Department of Environmental Protection  
Southwest Regional Office  
400 Waterfront Drive  
Pittsburgh, PA 15222-4745

## VIA CERTIFIED MAIL, RETURN RECEIPT

**Re: Submittal of 40 CFR §60.5410a and 40 CFR §60.5420a Initial Annual Report / Notification of Compliance Demonstration for Gas Well Affected Facilities Subject to 40 CFR Part 60, Subpart OOOOa  
For the Period of February 8, 2018 through October 10, 2018  
Snyder Brothers, Inc. – Renshaw Well Pad**

Dear Mr. Gorog:

Snyder Brothers, Inc. (Snyder Brothers) is submitting the enclosed initial annual report / notification of compliance demonstration for gas well affected facilities located at the Renshaw well pad subject to the requirements of 40 CFR Part 60, Subpart OOOOa – Standards of Performance for Crude Oil and Natural Gas Facilities for which Construction, Modification or Reconstruction Commenced After September 18, 2015 (Subpart OOOOa). Snyder Brothers is submitting this report for the compliance period of February 8, 2018 through October 10, 2018 in accordance with the requirements of 40 CFR §60.5410a(a) and 40 CFR §60.5420a(b). Pursuant to 40 CFR §60.5420a(b), an initial annual compliance report is required to be submitted no later than 90 days after the end of the initial compliance period. The initial compliance period for Subpart OOOOa begins upon initial startup and extends no later than one year after the initial startup date. Snyder Brothers is submitting this initial annual report for a period of less than one full year.

If you have any questions or require additional information, please contact me at (412) 508-5107 or at [sean.baker@snydercos.com](mailto:sean.baker@snydercos.com).

Sincerely,  
Snyder Brothers, Inc.

Sean Baker  
Engineer

Enclosures

Cc: Ms. Cristina Fernandez – U.S. EPA, Region III | Director, Air Protection Division

INDEPENDENT PRODUCER OF NATURAL GAS AND CRUDE OIL

**SNYDER BROTHERS, INC. (SNYDER BROTHERS)**

**40 CFR PART 60, SUBPART OOOOa –  
STANDARDS OF PERFORMANCE FOR CRUDE OIL AND NATURAL GAS  
FACILITIES FOR WHICH CONSTRUCTION, MODIFICATION OR  
RECONSTRUCTION COMMENCED AFTER SEPTEMBER 18, 2015**

***ANNUAL REPORT / NOTIFICATION OF COMPLIANCE DEMONSTRATION***

**RENSHAW WELL PAD**

40 CFR Part 60, Subpart OOOOa (Subpart OOOOa) initial compliance demonstration requirements and ongoing reporting requirements are codified at 40 CFR §60.5410a and 40 CFR §60.5420a, respectively. Applicability determinations for these requirements to Snyder Brothers natural gas production well sites and associated compliance demonstrations are provided hereafter.

***I. Notifications in accordance with 40 CFR §60.5410a(a)(1), as detailed in 40 CFR §60.5420a(a)(2)***

40 CFR §60.5420a(a)(2)(i) requires owner/operators of a gas well affected facility to submit notification to the Administrator that lists the anticipated date of the well completion operation. This notification must be submitted to the Administrator no later than two days prior to the commencement of each well completion operation. Snyder Brothers has constructed Subpart OOOOa gas well affected facilities during the reporting period. As such, the gas well affected facilities are subject to the notification requirement of 40 CFR §60.5420a(a)(2)(i).

Snyder Brothers 40 CFR Part 60, Subpart OOOOa gas well affected facilities are also subject to Pennsylvania's Act 13 of 2012 (Act 13), which became effective February 14, 2012. Pursuant to §3211(f)(2) of Act 13, Snyder Brothers provides 24 hours' notice to the Pennsylvania Department of Environmental Protection (PADEP) prior to cementing all casing strings, conducting pressure tests of the production casing, stimulation, and abandoning or plugging an unconventional well, via the PADEP online stimulation notification report. Furthermore, Snyder Brothers provides a completion report to PADEP within 30 days after completion of the well (i.e., when the well is capable of production) in accordance with §3222(b)(3) of Act 13. Pursuant to 40 CFR §60.5420a(a)(2)(ii), Snyder Brothers has met the advanced notification requirements of 40 CFR §60.5420a(a)(2)(i) by having met the advanced notification requirements of Pennsylvania Act 13.

Records of all electronic Act 13 stimulation notifications are maintained by Snyder Brothers. Copies of these notifications are available for inspection upon request. Snyder Brothers will continue submitting notifications in accordance with Pennsylvania's Act 13 and Exemption No. 38 provisions, as required.

***II. Reporting in accordance with 40 CFR §60.5410a(a)(2), as detailed in 40 CFR §60.5420a(b)***

40 CFR §60.5420a(b) requires owner/operators to submit annual reports providing information specified at 40 CFR §§60.5420a(b)(1) through (8) and (12). One report may be submitted for multiple affected facilities.

In accordance with 40 CFR §60.5420a(b)(11), Subpart OOOOa reports must be submitted via the U.S. Environmental Protection Agency (U.S. EPA) Compliance and Emissions Data Reporting



Interface (CEDRI), unless the reporting form specific to Subpart OOOOa is not available in CEDRI at the time that the report is due. While a draft version of the Subpart OOOOa Annual Report template is available on the U.S. EPA Oil and Natural Gas Industry webpage, the final reporting form template was not available in CEDRI at the time that this report was submitted. Snyder Brothers understands that facilities are not required to electronically submit the annual report until 90 days after the final template has been made available in CEDRI. Therefore, this report is being submitted in hard-copy to the appropriate delegated authority address.

**General Information [40 CFR §60.5420a(b)(1)]**

**(i) The company name, facility site name associated with the affected facility, US Well ID or US Well ID associated with the affected facility, if applicable, and address of the affected facility or description of the site location/latitude and longitude coordinates of the site:**

**Company Name and Address:**

Snyder Brothers, Inc.  
P.O. Box 1022  
Kittanning, PA 16201  
Phone (412) 508-5107

**Table 1**  
**Summary of Affected Gas Well Facilities per 40 CFR §60.5420a(b)**

Well Name	County	Township	Latitude	Longitude	API Number
Renshaw 1H	Armstrong	South Buffalo	40.71594	-79.62166	37-005-31261-00-00
Renshaw 2H	Armstrong	South Buffalo	40.71594	-79.62159	37-005-31262-00-00
Renshaw 3H	Armstrong	South Buffalo	40.71593	-79.62152	37-005-31263-00-00
Renshaw 4H	Armstrong	South Buffalo	40.71593	-79.62145	37-005-31264-00-00

**(ii) Identification of each affected facility being included in the annual report:**

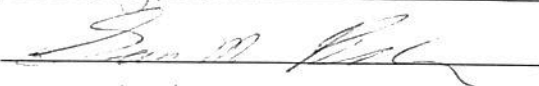
Identification of each affected gas well facility is provided in Table 1. Other affected facilities include fugitive emissions components associated with each affected gas well facility.

**(iii) Beginning and ending dates of the reporting period:**

Snyder Brothers is submitting this report for the period from February 8, 2018 through October 10, 2018.

**(iv) Certification by responsible official of truth, accuracy, and completeness:**

I certify that I am a certifying official as that term is defined in 40 CFR §60.5430a. I further certify, based on information and belief formed after reasonable inquiry, the statements and information in this document are true, accurate, and complete.

Responsible Official: Sean Baker  
Title: Engineer  
Signature:   
Date: 10/10/18

**Records for Well Affected Facilities [40 CFR §60.5420a(b)(2)]**

**(i) Records for each well completion operation:**

Attachment A provides a compilation of each well completion operation conducted during the reporting period, as detailed in 40 CFR §60.5420a(c)(1)(i) through (iv), for each gas well affected facility. In accordance with 40 CFR §60.5375a(b), Snyder Brothers completed the logs on a daily basis for the duration of each well completion operation, recording operations for only the days that activities were performed (i.e., days of inactivity are not included in the logs).

**(ii) Records of deviations:**

In accordance with 40 CFR §60.5420a(c)(1)(ii), there were no deviations during the reporting period, as detailed in Attachment A.

**(iii) Records specified in 40 CFR §60.5420a(c)(1)(vii), if applicable, that support a determination under 40 CFR §60.5432a that the well affected facility is a low pressure well as defined in 40 CFR §60.5430a:**

The Snyder Brothers affected gas well facilities, summarized in Table 1, do not meet the definition of a low pressure well, as defined in 40 CFR §60.5430a.

**Records for Fugitive Emissions Components Affected Facilities [40 CFR §60.5420a(b)(7)]**

**(i) Records for each monitoring survey conducted for the collection of fugitive emissions components at each well site:**

Attachment B provides the required records for each monitoring survey conducted for the collection of fugitive emissions components at each well site, as specified in 40 CFR §§60.5420a(b)(7)(i)–(xii). Please note that Table B-1 of Attachment B only contains results of monitoring surveys that have been conducted thus far. Snyder Brothers understands that semiannual monitoring surveys are required, per 40 CFR §60.5397a(g)(1).

***Subpart OOOOa Requirements Not Applicable to Snyder Brothers Renshaw Well Pad [40 CFR §§60.5420a(b)(2), (3), (4), (5), (6), (8), (9), (10), and (12), 60.5422a and 60.5423a]***

Snyder Brothers has determined that the requirements specified at 40 CFR §§60.5420a(b)(2), (3), (4), (5), (6), (8), (9), (10), and (12), 60.5422a and 60.5423a are not applicable to Snyder Brothers natural gas production well sites. Details of these non-applicability determinations are provided hereafter.

***STATEMENTS OF NON-APPLICABILITY OF  
OTHER POTENTIALLY AFFECTED SUBPART OOOOa FACILITIES***

**Compressors**

40 CFR §60.5420a(b)(3) and (4) specify reporting requirements for affected centrifugal and reciprocating compressors, respectively.

***I. Regulatory Background***

Pursuant to 40 CFR §60.5365a(b) and (c), a centrifugal compressor affected facility and reciprocating compressor affected facility, for which construction, modification, or reconstruction commenced after September 18, 2015, are defined as follows:

- Each centrifugal compressor affected facility, which is a single centrifugal compressor using wet seals. A centrifugal compressor located at a well site, or an adjacent well site and servicing more than one well site, is not an affected facility under this subpart.
- Each reciprocating compressor affected facility, which is a single reciprocating compressor. A reciprocating compressor located at a well site, or an adjacent well site and servicing more than one well site, is not an affected facility under this subpart.

***II. Compliance Approach***

Snyder Brothers does not own or operate centrifugal compressors or reciprocating compressors at its natural gas production well sites. Thus, the centrifugal and reciprocating compressor requirements of Subpart OOOOa do not apply to the Renshaw well pad.

**Pneumatic Controllers**

40 CFR §60.5420a(b)(5) specifies reporting requirements for affected pneumatic controller facilities.

***I. Regulatory Background***

Pursuant to 40 CFR §60.5365a(d)(1), a pneumatic controller affected facility, which is not located at a natural gas processing plant, is a single continuous bleed natural gas-driven pneumatic controller operating at a natural gas bleed rate greater than 6 standard cubic feet per hour (scfh) for which construction, modification or reconstruction commenced after September 18, 2015. In accordance with 40 CFR §60.5430a, Snyder Brothers owns and operates gas well production facilities that meet the definition of a well site.



## ***II. Compliance Approach***

Snyder Brothers owns and operates natural gas-driven pneumatic controllers at its natural gas production well sites. However, Snyder Brothers pneumatic controllers do not meet the affected facility criteria specified at 40 CFR §60.5365a(d)(2). The design specifications for Snyder Brothers pneumatic controllers specify that they do not continuously bleed. Based upon the information presented above, Snyder Brothers understands that they do not currently own or operate any affected pneumatic controllers at their natural gas production well sites. Therefore, the pneumatic controller requirements of Subpart OOOOa do not currently apply to Snyder Brothers natural gas production facilities. Manufacturer documentation for the pneumatic controllers used by Snyder Brothers is maintained on file and is available for inspection upon request.

### **Storage Vessels**

40 CFR §60.5420a(b)(6) specifies reporting requirements for affected storage vessel facilities.

#### ***I. Regulatory Background***

Pursuant to 40 CFR §60.5365a(e), a storage vessel affected facility is a single storage vessel with the potential for volatile organic compound (VOC) emissions equal to or greater than six tons per year (tpy) for which construction, modification or reconstruction commenced after September 18, 2015. In accordance with 40 CFR §60.5430a, a storage vessel is defined as follows:

- Storage vessel means a tank or other vessel that contains an accumulation of crude oil, condensate, intermediate hydrocarbon liquids, or produced water, and that is constructed primarily of nonearthen materials (such as wood, concrete, steel, fiberglass, or plastic) which provide structural support.

Snyder Brothers has commenced construction of storage vessels, as defined above, during this reporting period at its natural gas production well sites. In accordance with 40 CFR §60.5365a(e), Snyder Brothers understands that the potential for VOC emissions from the storage vessels must be calculated using a generally accepted model or calculation methodology, based on the maximum average daily throughput determined for a 30-day period of production prior to the applicable emissions determination deadline specified. Snyder Brothers also understands the applicable emissions determination deadline for storage vessels constructed during this reporting period is 30 days after startup.

## ***II. Compliance Approach***

Snyder Brothers has determined the potential VOC emissions from each potentially affected Subpart OOOOa storage vessel constructed during this reporting period to be less than six tpy. Therefore, pursuant to 40 CFR §60.5365a(e), Snyder Brothers does not currently own or operate any affected storage vessels at the Renshaw well pad.

As part of the Renshaw Well Pad Compliance Demonstration under Exemption No. 38, Snyder Brothers submitted VOC emissions estimates which include the calculation methodology, and demonstrate Subpart OOOOa non-applicability to PADEP. Documentation of the Renshaw well pad storage vessel applicability determination is also maintained by Snyder Brothers, and is available for inspection upon request.

### **Pneumatic Pumps**

40 CFR §60.5420a(b)(8) specifies reporting requirements for affected pneumatic pump facilities.

#### ***I. Regulatory Background***

Snyder Brothers operations are defined by Subpart OOOOa as well sites. Pursuant to 40 CFR §60.5365a(h)(2), a pneumatic pump affected facility located at a well site is a single natural gas-driven diaphragm pump for which construction, modification or reconstruction commenced after September 18, 2015.

A natural gas-driven diaphragm pump, as defined in 40 CFR §63.5430a, is a positive displacement pump powered by pressurized natural gas that uses the reciprocating action of flexible diaphragms in conjunction with check valves to pump a fluid. A pump in which a fluid is displaced by a piston driven by a diaphragm is not considered a diaphragm pump for purposes of this subpart.

#### ***II. Compliance Approach***

Snyder Brothers does not own or operate any pneumatic pumps. Thus, the pneumatic pump requirements of Subpart OOOOa do not apply to Snyder Brothers natural gas production facilities.

### **Closed Vent Systems**

40 CFR §60.5420a(b)(12) specifies reporting requirements for closed vent systems.

#### ***I. Regulatory Background***

40 CFR §60.5411a(d) specifies closed vent systems requirements for centrifugal compressor wet seal fluid degassing systems, reciprocating compressors, pneumatic pumps and storage vessels using a control device or routing emissions to a process. Owners/operators must conduct an assessment to document that the closed vent system is of sufficient design and capacity to ensure that all emissions from the affected facility are routed to the control device and that the control device is of sufficient design and capacity to accommodate all emissions from the affected facility. The assessment must be certified by a qualified professional engineer.

#### ***II. Compliance Approach***

Snyder Brothers does not own or operate any of the affected facilities for which closed vent systems requirements are specified in Subpart OOOOa. Snyder Brothers does not use a control device or route emissions to a process for any of its affected facilities. Therefore, the closed vent systems requirements of Subpart OOOOa do not apply to Snyder Brothers natural gas production facilities.

Because Snyder Brothers does not use a control device to comply with the applicable requirements of Subpart OOOOa, the requirement to conduct a performance test in accordance with 40 CFR §60.8 does not apply. Therefore, the performance test reporting requirements



codified at 40 CFR §§60.5420a(b)(9) and (10) do not apply to Snyder Brothers natural gas production facilities.

### **Process and Sweetening Units**

40 CFR §§60.5422a and 60.5423a specify reporting requirements for process and sweetening units.

#### ***I. Regulatory Background***

Pursuant to 40 CFR §60.5365a(f) and (g), and as defined further in 40 CFR §60.5430a, a process unit affected facility and sweetening unit affected facility (for which construction, modification or reconstruction commenced after September 18, 2015), are as follows:

- The group of all equipment within a process unit.
  - Process unit means components assembled for the extraction of natural gas liquids from field gas, the fractionation of the liquids into natural gas products, or other operations associated with the processing of natural gas products. A process unit can operate independently if supplied with sufficient feed or raw materials and sufficient storage facilities for the products.
- Sweetening units located at onshore natural gas processing plants that process natural gas produced from either onshore or offshore wells.
  - Sweetening unit means a process device that removes hydrogen sulfide and/or carbon dioxide from the sour natural gas stream.

#### ***II. Compliance Approach***

Snyder Brothers operations do not include natural gas processing. Snyder Brothers does not own or operate a process or sweetening unit. Thus, the process and sweetening unit requirements of Subpart OOOOa do not apply to Snyder Brothers natural gas production facilities.



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**ATTACHMENT A**  
**Affected Gas Well Facilities – 40 CFR §60.5420a(b)(2) Reporting**  
**Requirements**

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sean.baker@snydercos.com

**Completions Contractor:** Flowback; Colter / Frac; Keane Grp  
**Latitude/Longitude:** 40.715939 / -79.621661

**Footnotes:**

<sup>3</sup>Production begins when gas began flowing into a sales line.

**Venting / Deviation Notes:**



Flowback: Colter / Frac: Keane Grp  
40 715936 / -79 621589

**Venting / Deviation Notes:**

back: Colter / Frac: Keane Grp  
40.715931 / 79.621517

**Venting / Deviation Notes:**



[sean.baker@snydercos.com](mailto:sean.baker@snydercos.com)

Flowback: Colter / Frac: Keane Grp

**Completions Contractor:**

37-005-31264-00-00

API Number:

411

**Will Name:**

40.715928 / -79.621447

Latitude/Longitude:

**South Buffalo Twp**

**Township:**

long

County:

TOTALS:	
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<sup>1</sup> Record the date and time of each attempt to direct flowback to a separator.

<sup>2</sup>Flowback equipment was permanently disconnected.

<sup>3</sup>Production begins when gas has been flowing into a sales line.

**Venting / Deviation Notes:**

**Table B-1**  
**Snyder Brothers, Inc.**  
**Fugitive Emissions Components Affected Facilities - 40 CFR §60.5420a(b)(7) Reporting Requirements**  
**Renshaw Well Pad - February 8, 2018 to October 10, 2018**

Citation	Requirement	Information for Each Monitoring Survey Conducted During the Reporting Period <sup>(a)</sup>
40 CFR §60.5420a(b)(7)(i)	Date of the survey.	3/8/2018
40 CFR §60.5420a(b)(7)(ii)	Beginning and end time of the survey.	9:06 am to 9:48 am
40 CFR §60.5420a(b)(7)(iii)	Name of operator(s) performing survey. If the survey is performed by optical gas imaging, you must note the training and experience of the operator.	Michael Haberman, WEB-IR50-FLIR GF Camera Operations Basics Training (Infrared Training Center), lab and site training by Clean Air Systems (Pittsburgh, PA). Mr. Haberman has 7-years experience conducting FLIR camera surveys.
40 CFR §60.5420a(b)(7)(iv)	Ambient temperature, sky conditions, and maximum wind speed at the time of the survey.	25°F, mostly sunny, no precipitation, wind speed between 5 and 10 mph
40 CFR §60.5420a(b)(7)(v)	Monitoring instrument used.	FLIR GF320 Camera
40 CFR §60.5420a(b)(7)(vi)	Any deviations from the monitoring plan or a statement that there were no deviations from the monitoring plan.	There were no deviations from the Emissions Monitoring Plan.
40 CFR §60.5420a(b)(7)(vii)	Number and type of components for which fugitive emissions were detected.	No leaking components were found during any of the surveys.
40 CFR §60.5420a(b)(7)(viii)	Number and type of fugitive emissions components that were not repaired as required in 40 CFR §60.5397a(h).	N/A
40 CFR §60.5420a(b)(7)(ix)	Number and type of difficult-to-monitor and unsafe-to-monitor fugitive emission components monitored.	There were no difficult-to-monitor or unsafe-to-monitor fugitive emissions components at the site.
40 CFR §60.5420a(b)(7)(x)	The date of successful repair of the fugitive emissions component.	N/A
40 CFR §60.5420a(b)(7)(xi)	Number and type of fugitive emission components placed on delay of repair and explanation for each delay of repair.	N/A
40 CFR §60.5420a(b)(7)(xii)	Type of instrument used to resurvey a repaired fugitive emissions component that could not be repaired during the initial fugitive emissions finding.	N/A

<sup>(a)</sup> The results shown above are for all monitoring surveys that have been conducted thus far. Snyder Brothers understands that semiannual monitoring surveys are required, per 40 CFR §60.5397a(g)(1).